

At what stage is this **Modification** document in the process? **IGT112**: 01 Workgroup Report Refinements to the RPC Template **Draft Modification** Report Final Modification Report **Purpose of Modification:** This modification is seeking to refine the RPC template to add clarity and ensure it remains up to date and robust.

The Proposer recommends that this modification should be:

- subject to self-governance
- assessed by a Workgroup

This modification will be presented by the Proposer to the Panel on 18th July 2018. The Panel will consider the Proposer's recommendation and determine the appropriate route.



High Impact:

NA



Medium Impact:

NA



Low Impact:

Pipeline Operators, Pipeline Users and CDSP



Contents

- 1 Summary
- 2 Governance
- 3 Why Change?
- 4 Code Specific Matters
- 5 Solution
- 6 Impacts & Other Considerations
- 7 Relevant Objectives
- 8 Implementation
- 9 Legal Text
- 10 Recommendations
- 11 Appendix 1

| 2 | | |
|---|-----|------------|
| • | Any | questions? |

Contact:

3

4

4

5

6

6

7

7

7

Code Administrator





Proposer: **Kirsty Dudley**



Kirsty.Dudley@eone nergy.com



Timetable

| The Proposer recommends the following timetable: | | | | |
|---|-------------------------------|--|--|--|
| Initial consideration by Workgroup | 7th August 2018 | | | |
| Workgroup Report presented to Panel | 17 th October 2018 | | | |
| Draft Modification Report issued for consultation | 19th October 2018 | | | |
| Consultation Close-out for representations | 9 th November 2018 | | | |
| Final Modification Report available for Panel | 5 th December 2018 | | | |
| Modification Panel decision | 19th December 2018 | | | |



1 Summary

What

The current RPC template has some ambiguous descriptions which is resulting in Pipeline Operators interpreting, and therefore completing fields differently. This modification is seeking to address these issues by adding clarity to the RPC Invoice Template Document.

Why

The purpose of the RPC Invoice Template Document is to ensure a common approach to invoice backing data production is followed, the ambiguous business rules has resulted in multiple approaches being followed and manual work arounds being deployed by our finance team.

How

To ensure a consistent and robust approach to invoice backing data production is taken, additional clarity and business rules are to be added to the RPC invoice Template Document.

2 Governance

Justification for Self-Governance Procedures

The amendment of the RPC Invoice Template Document does not have any material impact on the future of gas customers, competition in shipping or safety of the network. The amendments are of a governance nature so should be progressed as Self-Governance.

Requested Next Steps

This modification should:

- be subject to self-governance
- be assessed by a Workgroup

3 Why Change?

The RPC Invoice Template document was created in 2013 and was refined in 2017 by IGT076S to ensure it aligned with IGT039 and the implementation of Project Nexus. Our recent review of the ancillary document and data received has identified that not all IGTs align in how they format the backing data for the header, footer or even the body of the information.

To ensure the process remains up to date, consistent and robust this modification has been submitted to refine and define the business rules to give clarity on the exact requirements.

We have identified the following high-level issues (although not limited to this list) which through development would improve the process and seek to reduce manual Pipeline User intervention in invoice loading and validation:

 Currently, ambiguously drafted header and footer information – amendments required to provide clarity and consistency;



- Although the format is for RPC supplies B10/B11 data which relates to legacy supplies can also be incorporated, there are currently no business rules relating to this so it would be beneficial to existing and new parties to add something, even if only limited;
- Some data received breaches the length specified in the RPC template but aligns with the UK
 Link CIC file, it is recommended the review also aligns data requirements with field names within
 UK Link requirements for consistency;
- There are no clear business rules for population of adjustment rows which would be beneficial for Pipeline Users to help with charge validation assisting Pipeline Operators with clearer business rules for data production and Pipeline Users for data validation; and
- There are 'conditional' fields but the descriptions do not contain information on the actual condition, adding this adds further clarity for production and validation.

The formal approach to query invoices is via the SOS Query process (ancillary document), however, not many (if any) Pipeline Users are using this process. Instead emails to invoice contacts are being sent to query ambiguous or differently interpreted data. Although it is difficult to quantify, it is perceived that additional clarity in the RPC template will result in a reduction in the number of queries relating to formatting.

4 Code Specific Matters

Technical Skillsets

Knowledge of RPC invoicing

Reference Documents

RPC Invoice Backing Data ancillary document

5 Solution

To address the ambiguity in the file format the proposed refinements to the current RPC Invoice Template Document are:

- Aligning the formatting to the Project Summary Reports (PSR) and UK Link files to give a common approach across codes;
- Moving the formatting guidance from the last page to notes on the overview page;
- Updating C-Character to T-Text to align with UK Link (currently only used in the header);
- Adding overview notes relating to legacy charges (B10/B11), query management and operational invoice contacts into the overview;
- Including notes relating to double quotes into the document (standard for .CSV files);
- Removal of the green RPC Template grid and merging the information into the file format (mirroring UK Link) and merging the data item names into the field number column – some names suggested may differ to current naming;
- Creation of a header information section;
- Creation of a footer information section;
- Giving the MPRN level data the heading of Record Type Definition;



- Adding in actual conditions for C-Conditional so it is clear the conditions to follow;
- Renaming column headings to align to UK Link e.g.
 - o FIELD NAME
 - OPT for Mandatory/Conditional/Optional (M Mandatory, C Conditional O Optional)
 - DOM for Domain (T text, N Numeric, D Date (DD/MM/YYYY))
 - o LNG for Number of characters
 - o DEC for Number of decimal places
 - DESCRIPTION
- Adding clarity for adjustment records populated;
- Updating Meter Type to Meter Mechanism which checking SPAA MDD the meter type = e.g.
 rotary, however, the RPC template is actually seeking to show the Meter Mechanism (A0086) –
 this solution seeks to align the requirements using an already approved data item rather than free
 text options in the RPC template; and
- Standard demonstration of the totals.

The intention of this modification is to deliver refinements and clarifications via wording changes rather than system changes, however, it is recognised that for some Pipeline Operators and Pipeline Users the refinements may result in IT refinements to deliver the consistent approach.

To support this modification an initial draft of the RPC template changes (including commentary) has been submitted with this proposal.

6 Impacts & Other Considerations

Depending on Pipeline User and Pipeline Operator system builds there may be an impact to systems to align with any solution approved. This change is seeing to make as many clarificatory updates via descriptions rather than via IT changes, although some IT changes maybe required.

Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

No – this is evolving the RPC template and doesn't impact the SCR.

Consumer Impacts

None expected as this relates to transportation invoicing

Environmental Impacts

None expected as this relates to transportation invoicing



7 Relevant Objectives

| Impact of the modification on the Relevant Objectives: | | | |
|---|-------------------|--|--|
| Relevant Objective | Identified impact | | |
| (A) Efficient and economic operation of the pipe-line system | None | | |
| (B) Co-ordinated, efficient and economic operation of | None | | |
| (i) the combined pipe-line system; and/or | | | |
| (ii) the pipe-line system of one or more other relevant gas transporters | | | |
| (C) Efficient discharge of the licensee's obligations | None | | |
| (D) Securing of effective competition: | None | | |
| (i) between relevant shippers; | | | |
| (ii) between relevant suppliers; and/or | | | |
| (iii) between DN operators (who have entered into transportation | | | |
| agreements with other relevant gas transporters) and relevant shippers | | | |
| (E) Provision of reasonable economic incentives for relevant suppliers to | None | | |
| secure that the domestic customer supply security standards are satisfied as respects the availability of gas to their domestic customers | | | |
| (F) Promotion of efficiency in the implementation and administration of the Code | Positive | | |
| (G) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the | None | | |
| Cooperation of Energy Regulators | | | |

This modification will deliver Objective F as it will incorporate efficient and effective edits to the RPC template which will ensure that the process remains consistent and robust using, also utilising common language between the SPAA and the CDSP file formats for UK Link.

8 Implementation

As soon as reasonably practicable, aiming for the June 2019 release (to allow 6 months for parties who may require system changes).



9 Legal Text

To be proposed by the Pipeline Operators but an initial document has been submitted with this modification.

10 Recommendations

Proposer's Recommendation to Panel

Panel is asked to:

- Agree that Self Governance/ procedures should apply
- Refer this proposal to a Workgroup for assessment
- Set up a Technical sub-group as part of the workgroup with a responsibility to agree the required system changes (RPC file formats, headers and trailers etc.) once the business rules are agreed.

11 Appendix

<u>Attachment 1 – RPC Ancillary Document Development Draft</u>